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8 BRENDA ALCANTARA

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10 **UNITED STATES DISTRICT COURT**
11 **CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION**

12
13 URSULA BYRAM, S.B. by and
14 through guardian ad litem TIMOTHY
15 BYRAM, N.B. by and through guardian
16 ad litem TIMOTHY BYRAM, and A.B.
17 by and through guardian ad litem
18 KAITLYN HUMENCHUK,
19 individually and as successors-in-
20 interest to Everett Byram,

21 Plaintiffs,

22 v.

23 COUNTY OF LOS ANGELES,
24 BLAKE RUNGE, and BRENDA
25 ALCANTARA,

26 Defendants.

Case No. 2:23-cv-09285-KS

**JOINT STIPULATION FOR
ORDER CONTINUING PRETRIAL
FILING DEADLINES**

[Assigned to Hon. Karen L. Stevenson,
Courtroom 580]

Trial Date: 02/10/2025

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28 TO THE HONORABLE COURT, ALL PARTIES, AND TO THEIR
COUNSEL OF RECORD:

Plaintiffs Ursula Byram, S.B. by and through guardian ad litem Timothy
Byram, N.B. by and through guardian ad litem Timothy Byram, and A.B. by and
through guardian ad litem Kaitlyn Humenchuk and Defendants County of Los

Angeles, Blake Runge and Brenda Alcantara (collectively “Parties”), through their respective attorneys of record, hereby stipulate to the following:

1. This request for a continuance of the settlement conference and discovery deadlines is made because a scheduling conflict with the currently set mediation date of August 19, 2024 has arisen with Defendants' counsel.

2. The Parties have met and conferred and selected and reserved October 25, 2024 as a mutually agreeable mediation date with mediator Richard Copeland.

3. The Parties currently do not seek to continue the expert disclosures.

4. Good cause exists for this continuation given that Defendants' trial counsel is unable to attend the currently scheduled mediation date of August 19, 2024 and continuing the settlement conference and discovery deadlines will assist in facilitating a successful settlement.

5. The Parties have completed non-expert discovery.

6. Working together, the Parties agree to continue the settlement conference and expert discovery deadlines as follows:

	Current Deadline	Proposed Deadline
Settlement Conference Deadline	August 23, 2024	November 15, 2024
Discovery Deadline – Expert	September 24, 2024	December 11, 2024
Post-Settlement Status Conference	September 6, 2024	November 15, 2024
Joint Status Report Due	August 30, 2024	November 22, 2024

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1 7. *The parties do not request a continuance of the Trial Filings (First and*
2 *Second Sets), Final Pretrial Conference or Trial date.*

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4 **IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.**

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6 DATED: August 22, 2024

THE LAW OFFICES OF DALE K. GALIPO

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9 By: /s/ Cooper Alison-Mayne

10 DALE K. GALIPO

11 COOPER ALISON-MAYNE

Attorneys for Plaintiffs

12 DATED: August 22, 2024

HURRELL CANTRALL LLP

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14
15 By: /s/ Jordan S. Stern

16 THOMAS C. HURRELL

JORDAN S. STERN

17 NICOLE G. ORTEGA

18 Attorneys for Defendants, COUNTY OF
19 LOS ANGELES, BLAKE RUNGE and
20 BRENDA ALCANTARA
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